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November 12, 2024

BY ECF

Honorable Cathy Seibel
United States District Judge
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

re: Ballard v. County of Rockland, et al. 7:24-CV-2944 (CS)

Dear Judge Seibel,

My office represents the Plaintiff Wayne Ballard in the above matter. In that capacity, I write with the consent of Defendant County of Rockland's counsel, Lorin Donnelly, Esq. and Defendants Hon. Thomas E Walsh, II, Peter Walker, and Matthew Wohl's counsel Robert Weissman, Esq., to respectfully request an extension of the deadline for Plaintiff's opposition to Defendants' Motions to Dismiss the Second Amended Complaint from November 18, 2024 until December 9, 2024 and to file one joint opposition brief responding to both motions of no more than 45 pages instead of two separate briefs of no more than 25 pages. Plaintiff is requesting additional time to respond to this motion because Mark Marino, Esq. had been co-counsel on this matter, but is no longer working on this matter and the undersigned has several other depositions and motions due in the ensuing weeks. Additionally, Plaintiff is requesting the joint opposition brief because many of the issues raised in the two motions to dismiss deal with similar issues and claims, which lend itself to being addressed collectively in one motion. However because of the different analysis between the individual defendants and the County defendant, Plaintiff requires the additional pages to address the two motions together.

Plaintiffs thank the Court for its consideration herein.

Respectfully submitted,

/s/ Evan Brustein

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